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Magistrate Judge Mary Alice Theiler

JUN 13 2024

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

v.

CHELSEA ALEXIS GRAY,
Defendant.

CASE NO. MJ24-359

COMPLAINT for VIOLATION

Title 18, United States Code, Section 930(a)

[Misdemeanor]

BEFORE the Honorable Mary Alice Theiler, United States Magistrate Judge,
Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT 1

(Possession of a Firearm in a Federal Facility)

On or about June 12, 2024, in King County and in the Western District of
Washington, CHELSEA ALEXIS GRAY did knowingly possess and cause to be present
a firearm, that is a black and silver, Smith and Wesson SD9VE, 9mm, bearing serial
number FBL4208, within the FBI Seattle Field Office building, located at 1110 3rd Ave,
Seattle, WA 98101, a federally facility where notice prohibiting the possession of
firearms was conspicuously posted at the public entrance to the facility.

1 All in violation of Title 18, United States Code, Section 930(a).

2 I, Justin Collis, being first duly sworn on oath, depose and say:

3 **INTRODUCTION**

4 1. The facts contained in this affidavit come from both from my personal
5 observations and knowledge, and from information obtained from other law enforcement
6 officers participating in this investigation. This affidavit is intended to set forth the facts
7 relevant to the determination of probable cause for the requested complaint and does not
8 set forth all my knowledge about this matter.

9 **AFFIANT BACKGROUND AND EXPERIENCE**

10 2. I am employed as a Special Agent (SA) with the Federal Bureau of
11 Investigation (FBI) and have been employed with the FBI since September 2022. I am
12 currently assigned to the Seattle Field Division where I am a member of the violent
13 crime, gang, and Transnational Organized Crime – Western Hemisphere squad.

14 3. I am a graduate of the Federal Bureau of Investigation Basic Field Training
15 Course. I have received over 400 hours of investigative and legal classroom training
16 which has provided me the ability to investigate numerous crimes, including drug related
17 offenses. Prior to joining the FBI, I obtained a Bachelor of Science in Law Enforcement
18 and worked as a financial investigator where I was tasked with reviewing financial
19 exploitation of elders and vulnerable adults. I wrote suspicious activity reports and
20 worked with local Adult Protective Services to report the abuse. In connection with my
21 official duties as a Special Agent with the FBI, I investigate a variety of criminal
22 violations of federal laws, including crimes of violence and firearm offenses. During my
23 time with the FBI, I have been involved in several cases involving such offenses.

24 4. I am a federal law enforcement officer of the United States within the
25 meaning of Title 18, United States Code, Section 2510(7). As such, I am empowered to
26 conduct investigations of, and to make arrests for, offenses enumerated in Title 18,
27 United States Code, Section 930.

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SUMMARY OF PROBABLE CAUSE

5. In or about the afternoon on June 12, 2024, CHELSEA ALEXIS GRAY entered the FBI Seattle Field office at 1110 3rd Ave, Seattle, Washington, 98101, through the main visitor's entrance, located at the corner of 3rd Avenue and Spring Street. The FBI Seattle Field Office is located on property leased by the federal government and is the duty station for numerous special agents, analysts, and support staff, who are regularly present and perform their official duties at this location.

6. GRAY stood in the visitor's entrance vestibule and asked Federal Protective Services (FPS) Officer Paul Dean to let her into the lobby so she could speak to an FBI Agent. GRAY was wearing a white dress with a white T-shirt over the dress, and a target painted on the front and back of the shirt and writing along the bottom. Officer Dean advised GRAY that she needed to file a report. GRAY stated she had done already done so. Officer Dean called the Special Agent (SA) on Duty to let them know GRAY wanted to speak to someone. While Officer Dean was on the phone with the Duty Agent, he looked up and saw GRAY, who standing inside the visitor's entrance vestibule, holding a semi-automatic pistol with both hands, and pointing it directly at her chest. The two photographs below (Exhibit A) show GRAY standing in the vestibule as described above.

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EXHIBIT A

7. FBI personnel and local law enforcement were alerted of the situation. FBI agents, including FBI Crisis Negotiator Ingrid Arbuthnot-Stohl, entered the guard post, located in the back of the main lobby, in view of the visitor's entrance vestibule. Seattle Police Department officers arrived on scene and secured the exterior perimeter of the building. SA Arbuthnot-Stohl spoke to GRAY through a phone that was connected to the intercom in the visitor's entrance vestibule. GRAY told SA Arbuthnot-Stohl that she was in possession of Weapons of Mass Destruction codes and that she was willing to die to get her message out. Throughout the conversation with SA Arbuthnot-Stohl, GRAY kept both hands on the pistol, pointing it at her chest, with her finger on or near the trigger, but never pointed the gun at anyone else.

8. After GRAY started to calm down, SA Arbuthnot-Stohl instructed GRAY to put the pistol on the ground, enter the main lobby with her hands up, and lay on the floor with her arms spread out to the side. GRAY entered the lobby, unarmed, and laid on the ground until FBI Agents took her into custody. An FBI Agent inspected the pistol and

1 observed the pistol was loaded with an empty magazine and one round in the chamber.
2 The pistol was identified as a black and silver, Smith and Wesson SD9VE, 9mm, bearing
3 the serial number FBL4208. The two photographs below (Exhibit B) show the pistol,
4 magazine and round. Agents conducted a background check on GRAY and verified that
5 she is the registered owner of the pistol.



EXHIBIT B

1 9. A Special Agent with the Bureau of Alcohol, Tobacco, Firearms and
2 Explosives (ATF) certified in conducting interstate nexus examinations of firearms has
3 reviewed photos of the Smith and Wesson SD9VE, 9mm pistol. Based on the photos and
4 her training and experience, she determined that the above-referenced pistol is a firearm
5 under federal law.

6 10. On or about June 12, 2024, Agents interviewed GRAY at the Seattle FBI
7 Field Office, after advising her of her *Miranda* rights, which she waived. GRAY made
8 the following statements. GRAY was unable to contact the FBI in person and was unable
9 to mail the paperwork, so she decided that the only way to provide the information to the
10 FBI was to get arrested. GRAY initially thought about bringing a fake bomb to the FBI
11 but did not want to threaten to hurt other people.

12 11. GRAY decided to bring her gun, which she described as a 9mm semi-
13 automatic pistol, and which she had owned for about a decade. The pistol had no rounds
14 in the “clip,” but a round in the chamber. GRAY had a round in the chamber to let the
15 FBI know that she was serious and so she could fire one shot “if that’s what needed to
16 happen.” She did not want to harm anyone else or threaten anyone else’s life.

17 12. GRAY is not an officer, agent or employee of the United States, a state or
18 political subdivision thereof, who is authorized by law to engage in or supervise the
19 prevention, detection, investigation, or prosecution of any violation of law, is not a
20 federal official or member of the armed forces, and was not carrying the pistol incident to
21 hunting or other lawful purposes at the time of the incident.

22 13. A written notice, “*Rules and Regulations Governing Conduct on Federal*
23 *Property*” was conspicuously displayed, as shown in the photograph below (Exhibit C),
24 inside of the FBI Seattle Field Office visitor’s entrance vestibule, to the right of the door
25 to the main lobby at the time of the incident. This is the same area where GRAY had
26 been standing with the pistol pointed at her chest. The *Rules and Regulations* notice
27 states in pertinent part, “Federal law prohibits the possession of firearms or other
28 dangerous weapons in Federal facilities and Federal court facilities by all persons not

specifically authorized by Title 18, United States Code, Section 930. Violators will be subject to fine and/or imprisonment for periods up to five (5) years.”



EXHIBIT C

1 **CONCLUSION**

2 14. Based on the above facts, I respectfully submit there is probable cause to
3 believe that CHELSEA ALEXIS GRAY committed the offense of Possession of a
4 Firearm in a Federal Facility, in violation of Title 18, United States Code, Section 930(a).

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8 JUSTIN COLLIS

9 Complainant

10 Special Agent, Federal Bureau of
11 Investigation

12 Based on the Complaint and Affidavit sworn to before me, and subscribed in my
13 presence, the Court hereby finds that there is probable cause to believe the Defendant
14 committed the offense set forth in the Complaint.

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16 DATED this 13th day of June 2024.

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18
19 MARY ALICE THEILER

20 United States Magistrate Judge
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